National Office - Siège social

APPENDIX 11 (Page 3 of 3)



Consumers' Association of Canada

Box 9300 Ottawa, Ontario K1G 3T9 Telephone (613) 733-9450

Association des consommateurs du Canada

Publishers of Canadian Consumer and Le consommateur canadien

July 11, 1985

Mr. J. O. Cliffe 432 Martin Grove Road Islinton, Ontario M9B 4M2

Re: C.G.S.B. Working Group on MMT in Unleaded Gasolines

Dear Mr. Cliffe:

Thank-you for your information and invitation to attend the inaugural meeting of the above Working Group. Unfortunately, at this time, we do not have anyone that can represent our association at the gathering.

Please keep us informed of the progress of your group and we shall make every effort to appoint someone to sit on our behalf on your committee.

Yours sincerely,

Terry Cave, P. Eng.,

Director,

Technical and Information

Services.

cc: Barb Goit

Excutive Vice President

Consumers' Association of Canada

### MOTOR VEHICLE MANUFACTURERS' ASSOCIATION

American Motors (Canada) Inc.

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#### ENVIRONMENT PROTECTION AGENCY - UNITED STATES

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#### SUPPLEMENTARY INFORMATION:

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Section 211(f)(1) of the Act makes it unlawful, effective March 31, 1977, for any manufacturer of a fuel or fuel additive to first introduce into commerce or to increase the concentration in use of any fuel or fuel additive for use in light duty motor vehicles manufactured after model year 1974 which is not substantially similar to any fuel or fuel additive utilized in the certification of any model year 1975 or subsequent model year vehicle or engine under section 206 of the Act.

Section 211(f)(4) of the Act provides that the Administrator of the EPA may waive the prohibitions of section 211(f) upon application of any fuel or fuel additive manufacturer if the Administrator determines that the applicant has established that such fuel or fuel additive will not cause or contribute to a failure of any emission control device or system (over the useful life of any vehicle in which such device or system is used) to achieve compliance by the vehicle with the emission standards with respect to which it has been certified under section 206 of the Act.

Ethyl, in their waiver request, have had the almost impossible task of trying to prove categorically that MMT will not cause or contribute to a failure of any emission control device or system. To date their requests for a waiver have been denied by the EPA.

APPENDIX VI (Page 1 of 4)

CRO	: 197	MEM 8'	TI	STS
11	116 T	haaa .	14/04	

# CRC 1978 1917 TESTS

		hree-Way C	•							
Beg 1 Results - gHC/mile - Clear Fuel					MIT					
		- CAR ID			-		- CAR ID			Effect
MILEAGE	V701	V702	V703	AVE	MILEAGE	V722	V723	V724	AVE	Mn-CI
0K	0.574	0.991	0.909	0.825	OK	0.598	0.649		0.624	-0.201
0.3K	0.846	0.600	923.0		0.3X	0.641	0.538	0.785		
0.3K	0.610	0.587	0.657		0.3K	0.556	0.656	0.491		
0.3X	0.925				0.3K					
0.3K ave	0.794	0.594	0.548	0.678	0.3K ave	0.599	0.597	0.638	110.0	-0.067
5K	0.658	0.774	0.730		5X	0.612	0.541	0.945		
<b>5</b> K	0.772	0.748	0.823		5K	0.767	0.521	0.618		
5K					5K			0.565		
5K ave	0.715	0.761	0.777	0.751	5K ave	0.690	0.531	0.709	0.643	-0.108
10K	0.559	0.520	0.833		10K	0.820	0.591	0.750		
10K	0.589	0.733	0.809		10K	0.745	0.665	0.746		
10K ave	0.574	0.577	0.821	0.691	. 10K ave	0.783	0.678	0.748	0.736	0.046
15K	0.613	0.544	0.831		15K	0.782	0.605	0.665		
15K	0.586	0.673	0.716		15K	0.779	0.642	0.744		
15K	0.554				15K	_				
15K ave	0.588	0.659	0.774	0.673	15K ave	0.781	0.624	0.705	0.703	0.030
15.1K	0.576	0.707	0.815		15.1K	0.568	0.635	0.717		
15.1K	0.684	0.695	0.818		15.1K	0.567	803.0	0.729		
15.1K ave	0.630	0.701	0.817	0.716	15.1K ave	0.558	0.522	0.723	0.637	-0.079
22.5K	0.643	0.593	0.795	3	22.5K	0.605	0.782	0.667		
22.5X	813.0	0.629	0.689		22.5K	0.674	0.674	0.617		
22.5X ave	0.631	0.611	0.742	0.661	22.5K ave	0.640	0.728	0.642	0.670	0.009
30K	0.645	0.576	0.668		30K	0.713	0.834	0.715		•.
30K	0.635	0.603	0.648		30K	0.769	0.748	0.680		
30K ave	0.540	0.590	0.658	0.629	30K ave	0.741	0.791	0.698	0.743	0.114
30.1K	0.716	ð23.0	0.763		30.1K	0.812	0.721	0.660		Fig. 75g
30.1K	0.769	0.564	0.909		30.1K	0.707	166.0	0.699	<b></b>	
30.1K ave	0.743	0.63.0	0.836	0.736	30.1K ave	0.760	0.691	0.680	0.710	-0.026
37.5X	0.825	0.492	0.762		37.5X	0.774	0.621	0.653		
37.5X	0.845	0.572	0.655		37.5X	0.859	0.657	0.740		
37.5X ave	0.835	0.532	0.709	0.692	37.5K ave	0.817	0.639	0.697	0.717	0.026
45K	0.841	0.583	0.520		45K	0.571	0.594	0.545		
45X	0.852	0.491	0.550		45X	0.562	0.721	0.746	A 455	
45X ave	0.847	0.537	0.540	0.541	45K ave	0.650	0.651	0.663	0.655	0.014
45.1K	0.641	0.578	0.637		45.1K	0.609	0.623	0.554		
45.1K	0.760	0.530	0.560		45.1K	0.624	0.661	0.675		
45.1K sve	0.701	0.554	0.599	0.618	45.1K ave	0.617	0.542	0.615	0.624	0.007
50K	0.847	0.514	0.653		50X	0.984	0.654	0.591		
50K	0.920	0.652	0.965		50K	0.631	0.723	0.677		
50K			0.833		50K	0.771				
50% ave	0.884	0.633	0.817	0.778	50K ave	0.795	0.689	0.634	0.706	-0.072
50K-5K	0.169	-0.128	0.041	0.027	50X-5X	0.105	0.158	-0.075	0.063	0.036
50K-0.3K	0.090	0.040	0.169	0.099	50K-0.3K	0.197	0.092	-0.004	0.095	-0.005
AVE.		0.505	A 700		AVE.	A 707	A 657	0.670	A 69A	0.000
0.3X - 50K	0.715	0.623	0.728	0.689	0.3K - 50K	0.703	0.657	0.679	0.680	-0.009

APPENDIX VI (Page 2 of 4)

CRC 1978 MENT TESTS

Area With Three Way Catalysts

CRC 1978 HHT TESTS

Volvo Cars With Three-Way Catalysts Bag 2 Results - gHC/mile - Clear Fuel										
					· Catalysts 0625gffn/g	HMT.				
	_	- CAR ID		•	<b>,</b> .		- CAR ID			Effect
MILEAGE	V701	V702	V703	AVE	MILEAGE	V722	V723	V724	AVE	Mn-CI
OK	0.025	0.031	0.009	0.022	0K	0.039	0.026		0.033	0.011
0.3K	0.021	0.030	0.011		0.3K	0.025	0.022	0.016		
0.3X	0.018	0.025	0.016		0.3K	0.028	0.024	0.028		
0.3X	0.011				0.3X					
0.5K ave	0.017	0.028	0.014	0.019	0.3K ave	0.027	0.023	0.022	0.024	0.005
5K	0.010	0.032	0.010		5X	0.038	0.021	0.077	•	0.000
<b>5</b> K	0.022	0.033	0.013		5K	0.035	0.017	0.071		
5K					5K		0.0	0.087		
5K ave	0.016	0.033	0.012	0.020	5K ave	0.037	0.019	0.078	0.045	0.025
10K	0.012	0.020	0.006	0.020	10K	0.049	0.028	0.177	V.0 12	0.025
ICK	0.010	0.022	0.012		10K	0.048	0.028	0.166		
10X ave	0.011	0.021	0.009	0.014	. 10K ave	0.049	0.028	0.172	0.083	0.069
15K	0.028	0.033	0.022		15K	0.105	0.031	0.155		0.003
15K	0.035	0.025	0.022		15K	0.085	0.032	0.265		
15X	0.024	***************************************			15K	0.000	0.002	7200		
15K ave	0.029	0.029	0.022	0.027	15K ave	0.095	0.032	0.210	0.112	0.086
15.1K	0.025	0.020	0.025	••••	15.1K	0.040	0.022	0.057	0.112	<b>V.000</b>
15.1K	0.021	0.011	0.034		15.1K	0.042	0.025	0.069		
15.1K ave	0.023	0.016	0.030	0.023	15.1K ave	0.041	0.024	0.063	0.043	0.020
22.5K	0.033	0.025	0.024	0.010	22.5K	0.089	0.101	0.084	0.040	0.020
22.5X	0.032	0.029	0.025	<b>a</b> :	22.5X	0.080	0.078	0.075		
22.5K ave	0.033	0.027	0.025	0.028	22.5K ave	0.085	0.090	0.080	0.085	0.057
30K	0.032	0.017	0.036	0.020	30K	0.000	0.056	0.131	0.003	0.037
30X	0.035	0.019	0.035		30K	0.097	0.058	0.101	·	
30K ave	0.034	0.017	0.036	0.029	30K ava	0.038	0.062	0.116	0.092	0.063
30.1K	0.035	0.024	0.030	0.023	30.1K	0.063	0.035	0.054	0.032	7.000 7
30.1K	0.034	0.021	0.026		30.1K	0.081	0.034	0.056		
30.1K ave	0.035	0.023	0.023	0.028	30.1K ave	0.072	0.035	0.055	0.054	0.026
37.5K	0.047	0.028	0.029	0.020	37.5X	0.165	0.049	0.047	0.034	0.020
37.5X	0.019	0.026	0.023		37.5X	0.112	0.043	0.051		
37.5K ave	0.033	0.027	0.025	0.029	37.5K ave	0.112	0.046	0.054	0.080	0.051
45X	0.044	0.027	0.020	0.029	37.0k ave 45%	0.133	0.040	0.039	0.080	0.051
45X	0.044	0.023	0.031		45X	0.072	0.007	0.059		
45K ave	0.044	0.024	0.031	0.033	45K ave	0.033	0.072	0.050	0.064	0.071
45.1K	0.041	0.024	0.031	V.VJJ	45.1K	0.056	0.072	0.053	0.004	0.031
45.1K	0.036	0.043	0.028	-	45.1K	0.030	0.043	0.051		
45.1K ave	0.039	0.037	0.030	0.035	45.1K ave	0.050	0.044	0.052	0.049	0.014
50K	0.048	0.050	0.042	0.033	50K	0.035	0.072	0.055	0.043	0.014
50K	0.057	0.054	0.044		50X	0.052	0.070	0.059		
50K	0.001	0.034	0.044		50X	0.056	0.070	0.003		
50% ave	0.053	0.052	0.043	0.049		0.054	0.071	0.057	0.064	0.015
JVI 444	V.000	V.UJZ	U.V-W	EFV.V	50K ave	V.VU7	v.071	0.007	V.004	0.015
50K-5K	0.037	0.020	0.032	0.000	EUN-EN	0.028	0.052	-0.021	0.020	-0.010
50K-0.3K	0.036	0.025	0.032	0.029	50K-5K	0.028	0.032	0.035	0.020	-0.010
~~~~	V.V.U	V.UZJ	0.030	0.030	50X-0.3K	0.030	0.040	0.033	0.040	0.010
AVE.					ALC					
	0.030	0.028	0.005	0.000	AVE.	0.060	0.045	0.084	0.066	A A76
0.3K - 50K	0.030	0.028	0.025	0.028	0.3K - 50K	0.069	0.045	V.004	0.056	0.038

APPENDIX VI (Page 3 of 4)

·									(Page 3 c	or 4)
•	CRC 197	8 MMT TES	75		CRC 1978 HHT TESTS					
Volvo Cors With Three-Way Catalysts					Volvo Cars With Three-Way Catalysts					
		K/mile - C	•	•			/mile - 0.0		Fuel	MMT
		- CAR ID		•					,	Effect
+ MILEAGE	V701	V702	V703	AVE	MILEAGE	V722	V723	V724	AVE	Mn-CI
OK	0.148	0.153	0.089	0.130	OK	0.081	0.187		0.134	0.004
0.3K	0.129	0.088	0.080		0.3K	0.085	0.122	0.107	• • • • • • • • • • • • • • • • • • • •	
0.3X	0.139	0.090	0.071		0.5X	0.037	0.202	0.131		
0.3K	0.067				0.3K					
0.3K #ve	0.112	0.089	0.076	0.092	0.3K ave	0.086	0.162	0.119	0.122	0.030
<b>5</b> K	0.090	0.167	0.083	•	5K	0.109	0.216	0.198		
<b>5</b> K	0.100	0.150	0.065		5K	0.124	0.135	0.140		
<b>5</b> X					5K			0.158		
5K ave	0.095	0.159	0.074	0.109	5K ave	0.117	0.176	0.165	0.152	0.043
10X	0.093	0.079	0.067		10K	0.125	0.187	0.255		
10K	0.076	0.082	080.0		10K	0.163	0.196	0.281		
10K ave	0.085	0.081	0.074	0.080	10K ave	0.135	0.185	0.234	0.185	0.105
15K	0.090	0.085	0.084		15K	0.254	0.149	0.256		
15K	0.095	0.086	0.153		15K	0.229	0.150	0.254		
15K	820.0				15K					
15K ave	0.094	0.086	0.119	0.100	15K ave	0.242	0.150	0.255	0.215	0.116
15.1K	0.088	0.051	0.086		15.1K	0.110	0.099	0.208		511,10
15.1K	0.068	0.064	0.075		15.1K	0.114	0.099	0.820		
15.1K ave	0.078	0.063	0.081	0.074	15.1K ave	0.112	0.099	0.514	0.242	0.168
22.5K	0.121	0.069	0.105		22.5K	0.155	0.192	0.173		
22.5X	0.120	0.080	0.069	ž	22.5X	0.147	0.167	0.168		
22.5X ave	0.121	0.075	0.088	0.094	22.5X ave	0.151	0.180	0.171	0.167	0.073
30K	0.125	0.078	0.105		30K	0.180	0.213	0.254		
30X	0.118	0.083	0.100		30K	0.167	0.237	0.224		
5050K ave	0.122	0.081	0.103	0.102	30% ave	0.174	0.225	0.239	0.213	0.111
30.1K	0.132	0.077	0.102		30.1K	0.126	0.130	0.128		7 74.
30.1K	0.123	0.083	0.100		30.1K	0.125	0.128	0.145		
30.1K ave	0.128	080.0	0.101	0.103	30.1K ave	0.126	0.129	0.137	0.130	0.02€
37.5K	0.141	0.085	0.089		37.5K	0.174	0.137	0.160		
37.5K	0.161	0.086	0.130		37.5K	0.288	0.158	0.173		
37.5K ave	0.151	0.086	0.110	0.116	37.5K ave	0.221	0.148	0.167	0.178	0.063
45K	0.165	0.093	0.125		45K	0.168	0.196	0.175		
45K	0.075	0.082	0.144		45K	0.164	0.180	0.148		
45K ave	0.120	0.088	0.135	0.114	45K sve	0.166	0.188	0.162	0.172	0.058
45.1K	0.115	0.099	0.102		45.1K	0.133	0.137	0.186		
45.1K	0.123	0.076	0.108		45.1K	0.136	0.143	0.129		
45.1K ave	0.119	0.088	0.105	0.104	45.1K ave	0.135	0.140	0.158	0.144	0.040
50K	0.161	0.112	0.136		50X	0.151	0.198	0.140		
50X	0.180	0.120	0.144		50X	0.155	0.196	0.146		
50X			0.138		50X	0.151				
50% ave	0.171	0.116	0.139	0.142	50X ave	0.153	0.197	0.143	0.164	0.022
50K-5K	0.076	-0.043	0.065	0.033	50K-5K	0.035	0.022	-0.022	0.012	-0.021
50X-0.3X	0.059	0.027	0.054	0.050	50X-0.3X	0.067	0.035	0.024	0.042	300.0-
										3.44
AVE.					AVE.					
0.3K - 50K	0.116	0.091	0.100	0.102	0.3K - 50K	0.151	0.165	0.205	0.174	0.071

## "CHARACTERIZATION OF AUTOMOTIVE

CATALYST EXPOSED TO THE FUEL ADDITIVE MMT"

BY
ETHYL CORPORATION
1 MARCH, 1989

Ethyl Corporation appreciates the opportunity to comment on SAE Paper 890582 titled "Characterization of Automotive Catalysts Exposed to the Fuel Additive MMT."

Using very few catalytic converters of unknown history, with no supporting tailpipe emission data and with a laboratory test for which no field correlation is shown, the authors conclude that "it appears that the fuel additive MMT had a deleterious effect on the efficiency of the catalysts tested." They report, but otherwise ignore, the lead on the converter and type of service.

Ethyl® MMT Antiknock Compound has been used in Canadian unleaded gasoline since 1977 at levels up to the Canadian General Standards Board (CGSB) maximum of 18 mg Mn/liter. To our knowledge, the nine catalytic converters referred to in this paper represent the first reported problems in Canada. Furthermore, in 1986 a Working Group within CGSB, on which Ford was represented, did not report any complaints due to MMT. In answer to system durability questions, the Working Group concluded that:

"The use of MMT at current CGSB levels does not significantly compromise emission-control system operation or component durability."

We refer now to 1979 and 1984 articles written by Ford and

published in American Chemical Society journals. (1,2) Both articles address the negative effects of lead on precious metal catalysts. In the 1979 article the authors state "these noble-metal TWC's are susceptible to poisoning by fuels." Using a pulse-flame reactor and fuel containing only 7 mg Pb/gal., the test converter efficiency dropped by 10% at near stoichiometric conditions. At a rich condition converter efficiency dropped by 50%. Since 1979, both catalyst chemistry and lead contamination have changed. Nevertheless, we believe that the potential effect of lead must be addressed.

With the range of lead levels (0.02-0.74% wt.) exhibited in SAE Paper 890582, we believe it is appropriate to assume that some degree of misfueling occurred. Ford addressed this in 1984. (2) "...if misfueling does occur the restoration of catalyst activity by simply reverting to unleaded fuel will not be very effective..." Based on catalyst industry comments, the lower lead levels in gasoline and/or the reduced incidence of misfueling which now exist may have lead to the use of higher palladium content catalysts. If so, the finding of the 1984 ACS article becomes even more important. "The deactivation of Pd (palladium) catalysts by lead (Pb) is more severe than for Pt (platinum)."

We again turn to previous SAE papers by Ford for an analysis of MMT's effect on catalytic converters. Specifically, Gandhi, et al state that "catalytic converter efficiencies for HC were found 2-3% higher with MMT fuels than with clear fuels after 50,000 miles". Lead levels of 0.24 to 0.45% wt. Pb were considered catalyst contaminants. In fact, 0.45% wt. Pb on the converter inlet without MMT, significantly reduced convertor efficiency (52% con. eff. for HC). (3)

A second vehicle operating on gasoline containing 0.125 g Mn/gal contained 0.24% wt. Pb on the convertor but completed 50,000 miles with 80% conversion efficiency for HC. In the conclusion section of SAE Paper 821193 Ford states:

"The vehicle data presented using 0.125g Mn/gal indicates retention levels of 1-2% Mn on the catalyst while reducing the levels of P, Zn, and Pb contaminants. Use of 0.125g Mn/gal for 50,000 mi at 12 mpg (1975 estimate) would result in approximately 520 g Mn input. The retention of 2% wt. Mn on a 1100 g monolithic catalyst represents 22 g or only 4% of the input Mn retained by catalyst compared to approximately 35% Pb retention in absence of MMT. This low retention of Mn is indicative of inert products which are only physically deposited and not chemically bound to the catalyst surface."

This information can be compared to manganese levels of 4.2-6.14% wt. for the two convertors analyzed in SAE Paper 890582. If we assume that the average level of MMT in Canadian gasoline was 0.03 g Mn/gal and the average fuel consumption of the two cars was 18 mpg, then a gross anomaly exists.

Recent Ethyl testing of a monolithic three-way catalyst showed manganese retention of 2.0% wt. Mn on the catalyst inlet. This catalytic converter had operated for 50,000 miles on gasoline containing 0.0625 g Mn/gallon. The lead level on the catalyst was only 0.025 wt.%.

We feel that considerable evidence suggests that the converters in the small sample examined by Ford had unusual histories, and question the assumption that "the vehicles were properly adjusted and fueled with gasoline that met the Canadian standard of 1/16 g/gal." If all cars were fueled properly, one must question why lead levels on the catalyst inlet ranged up to 0.75% wt. Second, proper maintenance is unfortunately not that common. Third, manganese retention substantially exceeds expectations.

In the summer of 1987, Ethyl Corporation undertook a program to determine if MMT was affecting Canadian cars equipped with current technology emission control systems. Using tailpipe exhaust emissions as our guide, we evaluated 15 1987 Canadian cars of which 5 were Fords. A similar group of U.S. cars was evaluated for comparison purposes. As an entire group and as a Ford subset, the emission data and operating experience do not suggest converter problems.

In 1988 we began a comprehensive 48-car test program to evaluate the performance of current technology engines and emission control systems. Half of the fleet are being operated on untreated Howell EEE gasoline and half on Howell EEE gasoline plus MMT. The test program is approximately at the halfway point. No incidence of catalyst plugging, emission system deactivation or excessive change in tailpipe emissions has been observed.

One very important feature being observed in Ethyl's current 48-car program relates to NOx emissions. In almost every case, the vehicle(s) operating on gasoline containing MMT exhibit a statistically significant decrease in the increase in NOx emissions over mileage when compared to control car emissions. Under very simple stoichiometric situations this could allow engine operation while maintaining excellent leaner NOx conversion efficiency. A decrease in NOx emissions from vehicles could result in reduced ozone formation.

We are continuing to generate extensive information from our on-the-road test program. In addition to emission and operability data, we plan to obtain information on the composition of converters after extensive use with fuels containing manganese from Ethyl MMT Antiknock Compound.

#### References:

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